

## **EXHIBIT A**



Mar 23 2009  
6:23PM

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In Re: Methyl Tertiary Butyl Ether ("MtBE")  
Products Liability Litigation

MDL No. 1358  
Master File C.A. No.  
1:00-1898 (SAS)

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This document relates to the following cases:

*City of New York v. Amerada Hess Corp., et al.*  
04 Civ. 3417

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**EXPERT REBUTTAL REPORT OF David B. Terry, P.G.**

**LEGGETTE, BRASHEARS & GRAHAM, INC.**  
6 Arrow Road  
Ramsey, NJ 07446

**Signature**

**March 23, 2009**

**Date**

**TABLE 2**  
Summary of Discharge Sources Used for Revised Analysis 2

siteID	year	address	v(m/yr)	head(m)	satThick(m)	Gasoline(gal)		MTBE %	MtBE(kg)		
						run1	run2		run1	run2	run3
s6-001	1994	138-50 Hillside Ave	53.15	5.30	29.15	150	150	11.90	49.18	49.18	49.18
	1998		51.59			50	500	11.63	16.02	160.20	640.81
	2001		50.53			50	500	10.04	13.83	138.30	553.20
s6-002	1989	84-02 (-04) Parsons Blvd	20.70	5.60	20.40	30	30	2.00	1.65	1.65	1.65
	1990		20.18			50	500	2.00	2.76	27.55	110.20
s6-003	1997	137-10 94th Ave	68.32	4.98	32.39	50	500	11.52	15.87	158.69	634.75
s6-005	2000	113-21 Merrick Blvd	44.40	5.23	23.52	50	500	10.00	13.78	137.75	551.00
	2001		43.49			50	500	10.04	13.83	138.30	553.20
s6-006	1998	144-10 Hillside Ave	52.36	5.41	21.85	50	500	11.63	16.02	160.20	640.81
s6-007	1989	93-05 168th St	24.00	5.54	19.80	50	500	2.00	2.76	27.55	110.20
s6-008	1991	93-59 183rd St	59.60	5.30	24.19	10	10	2.00	0.55	0.55	0.55
	1992		57.06			20	20	11.90	6.56	6.56	6.56
	1993		55.64			15	15	11.90	4.92	4.92	4.92
	1994		54.70			10	10	11.90	3.28	3.28	3.28
s6-009	2000	165-25 Liberty Ave	20.91	5.49	25.04	50	500	10.00	13.78	137.75	551.00
s6-010	1996	105-15 Merrick Blvd	13.47	5.48	24.38	50	500	11.90	16.39	163.92	655.69
s6-011	1999	109-67 Sutphin Blvd	69.61	4.97	29.81	50	500	10.72	14.77	147.67	590.67
s6-012	1997	131-07 Merrick Blvd	37.59	4.28	22.28	50	500	11.52	15.87	158.69	634.75
	2000		38.74			50	500	10.00	13.78	137.75	551.00
s6-013	1998	133-02 Jamaica Ave	63.61	5.18	32.13	50	500	11.63	16.02	160.20	640.81
s6-014	1994	116-60 Sutphin Blvd	105.52	4.19	28.89	50	500	11.90	16.39	163.92	655.69
s6-015	1990	162-35 N. Conduit Ave.	54.75	2.74	21.65	50	500	2.00	2.76	27.55	110.20
	2002		158.84			50	500	9.67	13.32	133.20	532.82
s6-016	1988	177-90 S. Conduit Ave.	107.74	2.99	21.68	50	500	2.00	2.76	27.55	110.20
s6-017	1993	108-01 Atlantic Ave.	117.84	4.16	30.25	50	500	11.90	16.39	163.92	655.69
	1997		106.36			50	500	11.52	15.87	158.69	634.75
s6-019	1993	148-12 Rockaway Blvd.	116.20	3.00	29.56	50	500	11.90	16.39	163.92	655.69
	1996		121.38			50	500	11.90	16.39	163.92	655.69

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s6-020	1997	156-07 Rockaway Blvd.	96.09	2.22	26.43	50	500	2000	11.52	15.87	158.69	634.75
	1987		100.84			50	500	2000	2.00	2.76	27.55	110.20
s6-021	1995	104-09 Atlantic Ave.	88.02	4.11	31.71	50	500	2000	11.90	16.39	163.92	655.69
	1999		77.67			50	500	2000	10.72	14.77	147.67	590.67
	1991		115.76			50	500	2000	2.00	2.76	27.55	110.20
s6-022	1992	161-51 Baisley Blvd	117.85	3.93	26.43	50	500	2000	11.90	16.39	163.92	655.69
	1998		114.68			50	500	2000	11.63	16.02	160.20	640.81
s6-023	1996	148-27 Liberty Ave	53.00	5.19	28.24	50	500	2000	11.90	16.39	163.92	655.69
s6-024	1997	107-17 178th St	32.78	5.39	25.82	50	500	2000	11.52	15.87	158.69	634.75
s6-025	2003	117-07 Guy Brewer Blvd	75.92	4.67	25.80	50	500	2000	7.37	10.15	101.52	406.09
s6-026	1996	171-07 Baisley Blvd	111.95	4.48	22.41	50	500	2000	11.90	16.39	163.92	655.69
s6-027	1998	162-16 Union Tpke	72.37	5.33	24.06	50	500	2000	11.63	16.02	160.20	640.81
s6-028	2003	138-68 94th St	54.09	5.12	29.93	50	500	2000	7.37	10.15	101.52	406.09
s6-029	1996	244 Linden Blvd	111.46	5.52	19.34	50	500	2000	11.90	16.39	163.92	655.69
s6-030	1988	108-46 Merrick Blvd	30.87	5.45	23.73	50	500	2000	2.00	2.76	27.55	110.20
s6-031	1998	188-06 Hillside Ave	105.75	5.10	23.69	50	500	2000	11.63	16.02	160.20	640.81
s6-032	1994	178-02 Union Tpke	51.11	6.95	17.01	50	500	2000	11.90	16.39	163.92	655.69
s6-033	1993	82-48 Woodhaven Blvd	57.02	5.52	38.40	50	500	2000	11.90	16.39	163.92	655.69
s6-034	1991	116-32 Merrick Blvd	73.57	4.89	23.18	50	500	2000	2.00	2.76	27.55	110.20
s6-035	2000	153-95 Rockaway Blvd	111.97	2.35	26.31	50	500	2000	10.00	13.78	137.75	551.00
s6-036	1990	167-02 Baisley Blvd	110.84	4.26	23.83	50	500	2000	2.00	2.76	27.55	110.20
s6-037	2000	109-03 Liberty Ave	103.96	3.51	33.90	50	500	2000	10.00	13.78	137.75	551.00

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s6-038	1998	123-05 101st Ave	111.56	4.34	29.03	50	500	2000	11.63	16.02	160.20	640.81
s6-039	1995	165-01 Hillside Ave	38.72	5.71	22.03	50	500	2000	11.90	16.39	163.92	655.69
s6-040	1998	166-06 Hillside Ave	39.67	5.68	21.53	50	500	2000	11.63	16.02	160.20	640.81
s6-041	1995	168-02 91st Ave	35.49	5.60	19.45	50	500	2000	11.90	16.39	163.92	655.69
s6-042	2001	134-15 Rockaway Blvd	117.98	3.18	32.48	50	500	2000	10.04	13.83	138.30	553.20